

REMARKS/ARGUMENTS

Pursuant to the requirement of 37 CFR 1.121(b), and as stated above, please substitute and replace all the claim sheets, as amended and as originally filed, with the above amended set of claims. The following claim rejections and objections were noted from the Office Action dated July 21, 2003, and pursuant to each paragraph, presented in the same order, arguments follow.

Claim Rejections – 35 USC § 112

3. *Claims 16-18 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.*

In response to this rejection, claims 16 and 17 have been amended to more clearly define the invention and claim 18 has been canceled.

Claim Rejections – 35 USC § 103

5. *Claims 20-21 were rejected under 35 U.S.C. 103(a) as being unpatentable over Park (U.S. 5,750,269) in view of Roberts (U.S. 5,453,459).*

In response to this rejection, claims 20 and 21 are being re-presented with discussion below to distinguish these claims over the cited prior art of Park in view of Roberts.

Upon close examination of Park and Roberts, Applicant notes that neither the Park nor Roberts reference teaches, discloses nor suggests the exact combination of claims 20 and 21, especially the recitation of the use of a caustic. Claims 6 and 15-16 of Roberts recite a neutralizer, but not the use of a caustic, especially the two listed in claims 20 and 21, those being sodium hydroxide and potassium hydroxide, and mixtures thereof.

The hydroxyl groups disclosed in Park at column 4, lines 27-33, do not disclose a caustic, nor are the present caustics mentioned anywhere in Park. Although Park utilizes a copolymer, Park does not teach, suggest nor disclose the present combination. Furthermore, Park requires the use of hot water (claims 5 and 63-67), which is unnecessary with the present invention. Applicant respectfully submits that the present combination of elements is therefore patentably distinguished over the cited prior art.

6. *Claim 15 was rejected under 35 U.S.C. 103(a) as being unpatentable over Swidler (U.S. 5,719,221) in view of Roberts (U.S. 5,453,459).*

In response to this rejection, Applicant has carefully reviewed the Swidler and Roberts references, and wishes to carefully delineate the patentable differences between the present claim 15 recitation and the subject matter disclosed and claimed in Swidler and Roberts.

It must be noted that the present claim 15 recites a method of using a unique composition that includes the use of a caustic. On the other hand, Swidler discloses the use of a surfactant without a caustic, and Swidler requires the use of an alkaline aqueous detergent solution for removal. It is this very difference that allows the present invention method to work using only water, without any detergent needed. And, while Applicant acknowledges that Roberts also states a need for the use of a mildly alkaline material to remove the coating, the patentable difference of the present invention over the cited references is evident when it is realized that merely washing with water will remove the coating composition to which claim 15 is limited.

Further, combining the methods of coating application disclosed in the Swidler and Roberts references does not yield the combination recited in claim 15. For this reason, Applicant respectfully submits that claim 15 is now allowable, and requests its allowance.

For the reasons above, Applicant respectfully submits that claims 15 through 21 are now in condition for allowance, and requests that the Examiner give such an allowance.

Applicant wishes to thank the Examiner for her thorough examination, and hopes, that by these Amendments, the subject matter of the present invention is now more clearly stated, such that a closer

Application No.: 09/996,467
Amdt dated November 21, 2003
Reply to Office Action of July 21, 2003

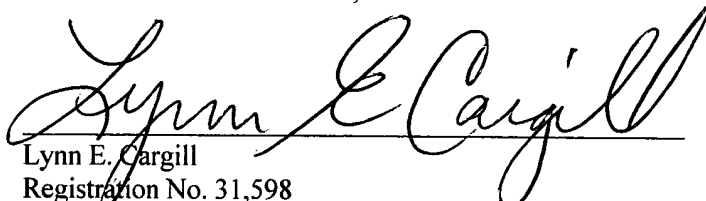
review of the present invention, in light of the amendments and arguments made here, will give solid support for an allowance. Consequently, Applicant requests reconsideration in the instant Application and withdrawal of all grounds of rejection and objection in view of the amendments and the following discussion.

If the Examiner feels that the prosecution of this Application can be expedited by conversation, she is courteously requested to place a telephone call to Applicant's attorney at the number listed below.

In view of the foregoing, it is believed that the remaining claims now distinguish over the prior art and are allowable. For the reasons discussed above, it is believed that this Application is now in an allowable condition such that it is appropriate to hereby respectfully solicit its allowance.

Respectfully submitted,

BOHDAN ZAJAC
CARGILL & ASSOCIATES, P.L.L.C.



Lynn E. Cargill
Registration No. 31,598
56 Macomb Place
Mt. Clemens MI 48043-5636
Phone: 586-465-6600

Date: November 21, 2003

C:\ProdSolP-311\OAResp112103